

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

UNITED STATES OF AMERICA,))
Plaintiff,))

vs.))

CRIMINAL CASE NO. RDB-21-00054

EGHOSASERE AVBORAYE-))
IGBENIDION,))
Defendant.))

Monday, June 12, 2023
Courtroom 5D
Baltimore, Maryland

JURY TRIAL
EXCERPT OF CLOSING ARGUMENTS

BEFORE: THE HONORABLE RICHARD D. BENNETT, Senior Judge

For the Plaintiff:

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ALSO PRESENT: Special Agent Jason Bender
Matt Kerrigan, Paralegal

(Computer-aided transcription of stenotype notes)

P R O C E E D I N G
10:01 a.m.

(Requested portion of transcript begins.)

THE COURT: We're getting a little bit of a late start because a juror overslept, but those things happen so that's the way it is.

And anything further from the point of view of the government before we proceed with closing argument?

MR. DELANEY: No, Your Honor. Thank you.

THE COURT: From the defense?

MR. GUILLAUME: No, Your Honor.

THE COURT: Good morning to everyone, and good morning to you Mr. Igbinedion, and to your mother. And we're ready to proceed.

Everyone may be seated, and we will bring in the jury. We have copies of the instructions, by the way, from the charge conference. Ms. Hudson will give those to you right now.

Thank you, Elizabeth.

And, obviously, counsel is free to make reference to those. I'll be charging after closing arguments. You're free to make reference to those during your arguments if you desire.

(Jury entered courtroom at 10:02 a.m.)

THE COURT: Good morning, everyone. Nice to see you.

1 And you all have filled out your lunch menus? Fine. You all
2 may be seated.

3 And with that, we're proceeding now with closing
4 arguments, and we'll first hear from government counsel.

5 MS. GOO.

6 MS. GOO: Thank you, Your Honor.

7 Good morning, ladies and gentlemen.

8 THE JURY: Good morning.

9 MS. GOO: Egho knew. Egho knew from day one that
10 there was money in the packages. Packages sent from Francis
11 Williams, Lloyd Harkey, Charles Carper, Norman Geller, Mary
12 Beitman, Richard Provolt, Reid Hansen, and Elaine Ricci. These
13 packages sent by panicked, loving grandparents who believed that
14 they were trying to help out their grandchildren. In panicked
15 fashion, these grandparents acted quickly because they thought
16 they were going to help their grandchildren from embarrassing
17 and life-compromising situations.

18 You heard from Mrs. Ricci that she got into a car
19 accident on the way to the shipping facility. These packages
20 were sent under completely false pretenses the evidence will
21 show, and I'll discuss in my closing argument that morning, but
22 Egho knew.

23 You heard from Arnold Charlemagne, from Jay that there
24 was money missing from a package that was delivered to Egho's
25 residence. And Jay was impressed by Egho because Egho tried to

1 take care of business himself.

2 Good morning, ladies and gentlemen. My name is
3 Christine Goo. I, along with Sean Delaney, Special Agent Jason
4 Bender, and our paralegal, Matt Kerrigan thank you for your time
5 and attention. We have noticed that you've been here every day
6 timely, taking notes, paying attention. We just ask that you
7 continue to do this through the remainder of the case. And
8 we're, obviously, almost done.

9 So we're going to walk through some of the evidence in
10 this case. And as the judge will later instruct you, and as
11 you've heard, there are five charges for your consideration.
12 The first is the conspiracy to commit the mail fraud. The next
13 four are the substantive counts of mail fraud. So I'm going to
14 turn first to the conspiracy, then I'll address the specific
15 individual charges of the mail fraud.

16 So first, as to the conspiracy, the elements that the
17 government must satisfy are that two or more persons entered
18 into an unlawful agreement to commit mail fraud as charged in
19 the superseding indictment.

20 Second, that the defendant knowingly and willfully
21 became a member of that conspiracy.

22 So let's talk about that conspiracy. This is a slide
23 that Mr. Delaney showed you in his opening statements. And what
24 we see here is the first three blue squares, going from left to
25 right, we have the first part that you hear the victims talking

1 about the phone calls. The fact that they're shipping the money
2 via FedEx or UPS after receiving very specific instructions from
3 the callers about stuffing the one hundred dollar bills into
4 these magazines, and then off it goes via FedEx or UPS to
5 various locations.

6 We're going to be focusing on the green squares.
7 That's where the evidence has shown that the defendant has been
8 involved in each of those parts of the conspiracy. So we're
9 going to take these boxes one by one, and I'm going to talk
10 about the evidence for each of those. So first, that the
11 defendant and others found properties to deliver packages to.

12 The next slide, as you have seen, there has been
13 evidence from the testimony of the witnesses. We heard from
14 Amaya English, McArnold Charlemagne, others, that talked about
15 why a specific residence was a good one for the package to be
16 delivered to. It has to be one that FedEx and UPS would
17 actually deliver to it. So we're not going to be talking about
18 one that's boarded up and vacant, one that looks like it is
19 recently occupied, but again, a vacant residence, because
20 otherwise you run into a situation where you either have to pay
21 the person to receive the package or somebody could intercept
22 the package for you, such as a realtor or someone like
23 Dr. Eileen Grant, which we'll talk about later.

24 What we have here, I just provided some examples of
25 the notes that some of the defendant's co-conspirators had

1 created documenting the creation of these lists, where these
2 packages were going to go to. Mr. Charlemagne talked to you and
3 explained to you that the list would go out one week, packages
4 sent to these addresses the next week, and it would continue to
5 cycle through. That was the process that Jay had come up with.

6 So we see here first, in Exhibit 19, David Green,
7 which we also heard from, had created a list dated January the
8 6th of 2019, modified January the 7th of 2019. And if you look
9 closely at Government's Exhibit 19, you'll see a list of
10 addresses all in Baltimore.

11 In Exhibit 95, Mr. Leevensky Lambert, who you also
12 heard from, told you that he maintained a list in the note
13 section of his phone. He had some kind of way of keeping track
14 of it. He couldn't remember if it was stars or squares -- or
15 I'm sorry, stars or X's that indicated it was a good address or
16 bad address, but he also maintained a list. You heard him
17 testify about that again from several co-conspirators. And you
18 also heard specifically that the defendant himself was also a
19 participant in this.

20 Next, turning to the package information that was
21 distributed to the defendant and others, and then the package
22 actually being delivered. So that's the next step in the
23 conspiracy. Again, you heard about the package information
24 going out. So there was a message that would come in through
25 wickr that would be shown to co-conspirators. Depending on

1 whether or not they're staying at the same place it could be
2 sent through text message. And there's a number of text
3 messages that we're going to show you during this closing
4 argument about -- showing that the messages were sent to the
5 various co-conspirators. Again, this was a portion of the
6 conspiracy that the defendant was specifically a part of.

7 And again, how do we know this? We know this from the
8 testimony of McArnold Charlemagne and Amaya English. David
9 Green told you about it, Sooraji Paliwal also explained that to
10 you. Aaron St. Juste -- and he has some really good exhibits
11 from his testimony -- shows you the defendant sending that
12 package information to him specifically. Leevensky Lambert, his
13 cell phone, those messages show communications back and forth
14 with Egho directing him about where to go to. And so as I
15 mentioned, it's not just the witness testimony from Mr. -- from
16 Egho co-conspirators, it's also corroborated by these text
17 messages. The Wickr messages and the delivery of the packages
18 themselves, corroborated by the FedEx and UPS information that
19 we have shown to you in trial.

20 Let's talk about some of these messages, and I
21 mentioned Mr. St. Juste specifically. So again, we're still
22 talking about the package information that's distributed to the
23 defendant and others. Here, Mr. St. Juste also testified before
24 you, and we went through Exhibit 80 specifically. The exhibit
25 started with the contact for Ghost. And so here you can see

1 that, the phone number listed for Ghost. And in the subsequent
2 messages between Egho and Mr. St. Juste you'll see a series of
3 wickr messages, other messages. It is very clear evidence of
4 the defendant again distributing information to Mr. St. Juste,
5 telling him where to go pick up these packages.

6 The next step in the conspiracy, again, is for the
7 co-conspirator to collect the packages. And that was based off
8 of, again, the information that each of the co-conspirators is
9 receiving through the wickr messages; the tracking information,
10 the addresses, but there was also some coordination that had to
11 occur in terms of who was going to go where. You heard, again,
12 testimony from the various co-conspirators about that.

13 And in this one specific message in Exhibit 80, again,
14 the conversation between Mr. St. Juste and Egho, we have Mr. St.
15 Juste's explanation here that this series of messages displayed
16 was actually Mr. Lambert using Mr. St. Juste's phone, because
17 Mr. Lambert didn't have a phone at that point in time.

18 But we see here that there's some confusion. If you
19 look at the top, it starts with a message from, again, Egho to
20 Mr. Lambert and Mr. St. Juste, where you can see the bottom
21 portion of that, the message which says: Me not just driving 15
22 minutes away not realizing your package delivered too.

23 And Mr. Lambert responds: You point man, you supposed
24 to make sure that it's straight in the first place.

25 So again, evidence through the phone, evidence of the

1 fact that Egho was, in fact, the point man. He was the person
2 who was helping to coordinate packages in January of 2019.

3 We then move to the co-conspirators collecting the
4 packages. So what events do we have of Egho himself collecting
5 packages? Again, we have the testimony of McArnold Charlemagne
6 and Amaya English. And what I would pay attention to is that we
7 have testimony of the different witnesses for different periods
8 of time.

9 So Mr. Charlemagne and Ms. English told you that their
10 involvement in the case really began in -- for Mr. Charlemagne
11 it was in the beginning of 2018 going through the end of 2019.
12 For Ms. English it was sometime in the middle of 2018. But the
13 two talk a lot about the involvement of Egho in the summer of
14 2018, which coincides with, again, the time that Egho began his
15 involvement in the conspiracy.

16 We then move to David Green. David Green gets
17 involved. He's recruited by Egho. He gets involved in August
18 of -- I think it's about August of 2018. And he talks
19 extensively about him picking -- about he, himself, picking up
20 packages, about Egho picking up packages. And again, that goes
21 from August of -- about August of 2018 going well into 2019.

22 We have the testimony of Sooraji Paliwal. Here
23 Mr. Paliwal gets involved in the conspiracy in about October of
24 2018. He talks about his involvement for about a month.

25 We then have the testimony of Mr. Leevensky Lambert as

1 well as Aaron St. Juste who, based off the phone evidence and
2 their testimony, tell you about their involvement with Egho in
3 about January of 2019.

4 we also have the testimony of non-cooperators. You
5 heard from Detective Norman Shifflet with the Baltimore Police
6 Department. He was working in drug interdiction, checked in
7 with FedEx one day in August of 2018. He was alerted to a
8 possible suspicious package being sent to an address on
9 Edmondson Avenue. He went to that location to see if anybody
10 was going to be waiting for a package. Communicated with the
11 FBI and learned that there was an investigation that was
12 ongoing. Went there. Lo and behold, who did he see? Amaya
13 English and Egho. You heard from Amaya that they were supposed
14 to engage -- they were supposed to exchange packages.

15 Detective Shifflet also told you that he saw one of
16 them, he can't recall which one, one of them was looking at the
17 FedEx information. And, in fact, the shipping company that
18 alerted Detective Shifflet to the possible suspicious package
19 was, in fact, FedEx. So again, this is -- the fact that he was
20 involved with collecting packages corroborated not only by the
21 co-conspirator but by the testimony of a detective completely
22 unrelated to this investigation.

23 we have the arrest of Mr. Lambert, Keion Smith, and
24 Egho where they're arrested for trying -- for picking up
25 packages. You heard from Mr. Lambert that Egho and Keion were

1 asleep. He was trying to get out at this point, and he saw the
2 truck leaving. You know, I'm just going to go ahead and pick up
3 this package. I'm tired, I want to go home. That's not what
4 happened. Instead, all three got arrested, and that was in
5 February of 2019.

6 But in addition to all of these folks we have the
7 testimony of Dr. Arlene Grant. July the 7th of 2018, Dr. Grant
8 told you that she received a package. So let's go through the
9 sequence of events as it relates to Dr. Grant, as well as Mr.
10 and Mrs. Ricci.

11 So Mrs. Ricci, who you saw testify yesterday, she and
12 her husband get a phone call. It's the same fraud scheme.
13 Mrs. Ricci speaks with her husband; she said it was a lot of
14 money to send but she wanted to -- they decided they wanted to
15 help out their grandchild. They package up the money.
16 Mrs. Ricci, on the way to the shipping company, gets in a car
17 accident. She's emotional. She's upset, and understandably so.
18 The package eventually gets sent.

19 Now, prior to sending the package one of the Ricci's
20 put down a phone number. That phone number then later gets
21 called by Dr. Eileen Grant when she receives the package.
22 Dr. Grant sees the information on the package and calls the
23 sender. The sender tells Dr. Grant to try and hold back the
24 package since obviously this is not supposed to end up with
25 Dr. Grant. That was not the purpose for them sending the money.

1 But who shows up to Dr. Grant's door? Egho. Egho
2 does. Egho tries to convince her that the package was intended
3 for him, not for Dr. Grant. Dr. Grant tries to tell him no.
4 They have a conversation that you heard about from Dr. Grant.
5 You heard about it from McArnold Charlemagne. During this
6 conversation Egho then becomes aware of exactly what he's doing.
7 July the 7th of 2018.

8 So Dr. Grant confronts Egho, but Egho snatches the
9 package away from her and runs away. Dr. Grant calls the
10 police. She speaks with Sunrise Police Department. They show
11 her a photographic array, she identifies Egho. That's in
12 Exhibit 50. So we have clearly here the defendant himself,
13 eyewitness, collecting a package. And not only do we have the
14 testimony of Dr. Grant, but we also have the cell site data
15 which puts Egho's phone at Dr. Grant's house at the time of the
16 FedEx delivery. That is Exhibit 130 which is one of the pages
17 of the CAST report.

18 We next move to the next box in the conspiracy which
19 is the managers collecting packages with cash. Here, again, we
20 have the testimony of Mr. Charlemagne, Ms. English, David Green,
21 Aaron St. Juste, as well as Leevensky Lambert. Mr. Charlemagne
22 talks about how on a daily basis he, along with Egho and Amaya,
23 would collect packages from the various people in the scheme.
24 So as Mr. Charlemagne and Ms. English describe it, there's three
25 tiers to the conspiracy. First, you have Jay who is operating

1 above everybody with the packages, and then have you the
2 managers that develop over time, not obviously in the beginning.
3 They also have to build trust with Jay, but eventually they have
4 these managers. We have Amaya English, David Green, McArnold
5 Charlemagne, and Egho.

6 At the bottom we have the people that are picking up
7 the packages. So at the end of the day, you heard it over and
8 over and over again, they get sent out to pick up the packages.
9 The packages are collected, and they drop it off with the
10 various managers. Egho was one of them. When Mr. Charlemagne
11 was asked on the stand about how many times he saw Egho doing
12 this, daily basis, and that was clear.

13 It was the same with Mr. Green. Mr. St. Juste told
14 you in that one week he was involved with the scheme the
15 packages were dropped off on a daily basis to Egho himself. And
16 Mr. Lambert told you that he also delivered packages to Egho
17 during his time in the conspiracy.

18 We have here, again, cell phone evidence documenting
19 the fact that Ghost was -- that Mr. Lambert and Mr. St. Juste
20 were trying to drop off a package or get a package to Egho.

21 So we have Mr. Lambert here saying: You at another
22 location?

23 And Mr. St. Juste says: Nah, I'm waiting for Ghost to
24 come grab this.

25 And as you heard him, Mr. St. Juste during his

1 testimony, he was talking about a package. And the dates of
2 these packages are February the 1st of 2019.

3 We have additional video evidence of the managers
4 collecting packages with cash. From Mr. Paliwal, he told you
5 about taking a video. Now the video is -- it's very quick. I
6 think it's like two or -- two seconds of a video, so I took a
7 screenshot of it, which I think is probably the easiest way to
8 show what is happening. The video itself though is Exhibit 76.

9 Egho is closing the trunk of the car. We know from
10 the testimony of Mr. Paliwal that Egho was putting a package in
11 Jay's car. This was in, I believe it was Clifton, I believe it
12 was, New Jersey.

13 We have the managers counting cash and paying
14 co-conspirators. Again, we have the testimony of the
15 co-conspirators talking about how they would open the packages
16 at the end of the day. There were only certain people that were
17 allowed to do this, and they would receive payment to -- from
18 the managers.

19 So we have the testimony of Mr. Paliwal and Mr. St.
20 Juste talking about how they had been paid. But we have the --
21 the evidence of Mr. Green, Ms. English, and Mr. Charlemagne
22 talking about how they had seen Egho opening packages, again, on
23 a daily basis.

24 Mr. Charlemagne talked about how Egho had seen him --
25 Egho had taken video of Mr. Charlemagne opening the packages and

1 counting the money. And again, Ms. English talked about how she
2 had also observed the same thing as well.

3 We have video evidence just sort of demonstrating what
4 exactly that looks like. That's going to be Exhibit 29 and 30
5 in the evidence. We're hoping to play it in the PowerPoint but
6 we're having a hard time switching back and forth between the
7 two platforms.

8 I'm going to show you part of the video on my laptop,
9 which is not going to be the best view, but I would encourage
10 you, if you would like to see a better view, that you look at it
11 during your deliberations.

12 I'll start on this end of the jury box and then -- and
13 this is playing Government's Exhibit 30.

14 (Video played.)

15 And so I'm going to restart it on the other side of
16 the jury box.

17 And this came in through Mr. Green's testimony who
18 talks about the fact that this was in a fast food restaurant.
19 And he had opened up the package in a bathroom on a baby
20 changing station, okay.

21 And the last step in the conspiracy is the manager
22 taking the cash to New York. Again, we have the testimony of
23 three of the managers; we have Mr. Charlemagne, Ms. English, and
24 Mr. Green.

25 Again, Mr. Charlemagne told you that he had

1 discussions with Egho about taking the money up to New York. He
2 had seen Egho get into -- I believe it was an Uber on a few
3 occasions on his way to make the drop.

4 David Green testified that he was with Egho on a few
5 occasions when either one of them had gone up to New York to
6 drop off the money. And it makes sense that the two of them
7 went together because again, David Green told you at the
8 beginning of his testimony that Egho was a friend. He had known
9 him for years. Mr. Green had, in fact, loaned Egho money, and
10 that's how he got involved in the scheme. This was somebody
11 that Egho had known, certainly had trusted, and so it makes
12 sense that that's somebody who Egho would go up to New York to
13 make, again, these big drops.

14 And you also heard from Ms. English who talked about
15 Egho's rising rank in the scheme; his trust with Jay built over
16 time. After she got arrested in, I believe it was October of
17 2018 by the DEA, when she made her money drop, she was out but
18 she was still with Jay. She saw everything that was still going
19 on and Egho was making those money drops after she was done.

20 Fast forwarding to February 9th of 2019. Egho,
21 Leevensky Lambert, and Keion Smith are arrested in Florida --
22 again, picking up a package -- by the police. So this is an
23 important date, because at this point, as you heard from
24 Mr. Lambert, he was arrested, charged in state court as a result
25 of this. What were the charges? The charges were elder -- it

1 was a fraud scheme over \$50,000. Mr. -- and Egho -- Mr. Smith,
2 Egho, they were all charged at that same point in time.

3 So February 9th of 2019, did Egho know what was going
4 on at that point? I think the evidence suggests that. But did
5 Egho, in fact, stop what he was doing? No, he did not. He
6 continued the fraud activity after his arrest in Florida.

7 So Exhibit 38 -- and I'm sorry, Exhibit 27 and Exhibit
8 38 I would direct you to. So Exhibit 27 is a text conversation
9 between David Green and Ghost. Ghost is sending David Green yet
10 another tracking number on March the 23rd of 2019. We have this
11 tracking number through UPS records, that's Exhibit 38. And the
12 UPS records are a little bit tricky to see so I tried my best to
13 try to get these zoomed in for you. But again, we have the
14 tracking number and it's a package being delivered to 439 West
15 Frederick Street in Lancaster, Pennsylvania.

16 Now, again, we have this information zoomed in here.
17 There's a delivery date of March the 23rd of 2019, and, again,
18 an address of 439 Frederick Street. And we have yet another
19 note from David Green in Exhibit 36 which shows, if you look
20 carefully, the address of 439 Frederick Street. The note is
21 created on March the 23rd, 2019, last modified on March 23,
22 2019. And again, the date of delivery for that package was
23 March the 23rd of 2019. So message from Ghost to David Green,
24 package again delivered at that point in time. And we know
25 again from the testimony of David Green that these are not

1 legitimate packages, these are fraud packages.

2 So that's the conspiracy. And I'll talk a little bit
3 more about it on the conclusion, but I would like to turn our
4 attention now to the mail fraud itself. So we have Counts Four
5 through Seven which are the -- what we call the substantive
6 counts of the mail fraud.

7 So in order for the government to prove that the
8 defendant Egho has committed a mail fraud, the government must
9 first prove that there was a scheme or artifice to defraud or
10 obtain money or property by materially false and fraudulent
11 pretenses, representations, or promise as alleged in the
12 indictment. That's the elder fraud scheme. That's the phone
13 calls that are being made to the victims.

14 Second, that the defendant knowingly and willfully
15 participated in the scheme or artifice to defraud, with
16 knowledge of its fraudulent nature, and with specific intent to
17 defraud. And that in the execution of that scheme the defendant
18 used or cause the use of mails as specified in the indictment.
19 So let's talk about those individual counts.

20 First of all, the counts all occur in January of 2019.
21 So let's start with that basis. The FBI requested a lot of
22 flight records, a lot of Air B&B, a lot of Motel 6. But during
23 January of 2019, we paid attention specifically to the flight
24 records as well as the Motel 6 records.

25 So Exhibit 135 is -- are the records from, I believe

1 this is Spirit Airlines, and Exhibit 137 is the Motel 6 records.
2 We are showing you some of these records but have not displayed
3 all of them. You'll see a number of times in which Egho was
4 here at this very same Motel 6 at the same time that the
5 witnesses told you they were, especially in the summer of 2018.

6 The same with the flight records. I'm showing you
7 some during this argument but not all of them. I would
8 encourage you to look at more of them. Egho, a resident of
9 Florida, was traveling back and forth to Baltimore frequently.
10 Use your common sense. Think about what he was doing on all of
11 those flights.

12 So we have here -- and I'm sorry. Focusing on this
13 specific slide, Egho was in Baltimore from January 11th of 2019,
14 through January the 13th of 2019. We have the flight records
15 that support this as well as the Motel 6 records.

16 So Count Four, Mr. Francis Williams. You saw his
17 video deposition. He told you that he received a phone call
18 that one of his grandchildren was arrested. He withdrew \$9,800
19 on January 11th of 2019, and was specifically instructed to send
20 that to 314 Southway in Baltimore, Maryland. That package was
21 received on January the 12th of 2019.

22 The records show that, again, Mr. Williams sent the
23 package to 314 Southway in Baltimore, Maryland, 21218, and it
24 was delivered to the front door. And we know that through the
25 UPS records. We have text messages. We have a text message

1 from Egho to Mr. Lambert with that location information
2 specifically for 314 Southway. That message is sent on January
3 the 12th of 2019 at 9:44 a.m.

4 And I would, again, looking at the records, if you --
5 devil's always in the details. If you look specifically, and
6 this one is harder to read off of the presentation right now,
7 but if you look carefully at the records you can see that the
8 arrival time for that package is at 9:54 a.m.

9 So we have those records, and then we have the cell
10 site information. So here I know that Agent Fowler, you know,
11 explained how the cell site technology works, but let's just
12 kind of break it down in terms of what exactly all that
13 testimony meant, all the dots, all the different sectors and
14 vectors.

15 So what we have here in Exhibit 134, 314 Southway
16 specifically, is that the cell site data placed three people in
17 the vicinity of 314 Southway, close in time to when the FedEx
18 facility is. So the red rectangle in the upper left-hand corner
19 tells you what time the package was delivered. And we see here
20 in the other boxes labeled CID and then a series of four
21 numbers, the various phone calls. And it tells you the numbers
22 that are making those phone calls.

23 So what we learn from this is that Jay, with the 202
24 number, he's in that vicinity. Jay, again, being the person who
25 is in charge of everybody. We have Egho in the area as well

1 using a 786 number, and we have David Green also in the area of
2 754 -- I'm sorry, with the number starting with 754. So again,
3 three people in the same area based off of the cell site
4 information, corroborating the testimony of David Green.

5 Count Five, 4018 Chesmont Avenue, January 12th of
6 2019. We have Mr. Lloyd Harkey, he lost \$13,000. Tracking
7 information shows, again, that a package was delivered on
8 January the 12th of 2019 to 4018 Chesmont Avenue. And you see
9 here the tracking number of 1Z940X, so on and so forth.

10 Now, here I tried to make sure that you could see that
11 tracking number, because in Exhibit 142 we again have a message
12 from Mr. Lambert's phone showing tracking information related to
13 Mr. Harkey. And again, we have testimony from Mr. Lambert about
14 his involvement working with Egho at this point in time. And we
15 also have the text messages from Mr. Lambert and Egho. So we
16 have a message dated January 12th of 2019 at 9:50 saying, on my
17 way, and then we have the photograph and two videos taken by
18 Mr. Lambert. And this is the situation where the realtor was
19 outside. Mr. Lambert was trying to figure out what to do. He
20 was communicating with Egho during this period of time. The
21 photograph of the realtor is 96A. If you would like to watch
22 those videos again, those are at 96B and 96C.

23 And actually, lastly as to 4018 Chesmont Avenue, there
24 was a paragraph, the overview of 4018 Chesmont Avenue that was
25 shown to Mr. Lambert. He confirmed yes, that's the house that I

1 was waiting outside of it. You also had the testimony of
2 Mr. Moody of the FBI talking about the fact that 4018 Chesmont
3 Avenue, on that day, was on the list of fraudulent packages.
4 They looked at the videos for Mr. Lambert as well as that
5 picture and were able to determine that that was, in fact, the
6 house that the fraudulent package was sent to.

7 Count Six and Seven. We have, again, evidence that
8 Egho was in Baltimore on January the 16th through January the
9 20th of 2019. We have the flight records showing his outgoing
10 flight from Fort Lauderdale Airport on January 16, 2019,
11 returning on January 20, 2019, again from BWI to Florida, Ft.
12 Lauderdale, Florida. We have Motel 6 records showing that he
13 checked into the motel from January the 17th and checked out on
14 January the 20th of 2019. And again, those are Exhibits 135 and
15 137.

16 So first, turning to Count Six, 3016 Kenyon Avenue.
17 The date that that package arrived is January the 18th of 2019.
18 Again, in that span of time that Egho is here in Baltimore.
19 Victim here is Mr. Richard Provolt. He lost \$8,000. We have
20 here information about Kenyon Avenue specifically in David
21 Green's notes. That's Exhibit 21. So if you look carefully, in
22 the third set of I'll call them paragraphs, the third paragraph
23 down where it says Egho five pickups total Friday, 3016 Kenyon
24 Avenue and 2802 Maryland Avenue. So we have that note first
25 from David Green.

1 Next, we have counts -- the cell site information. At
2 7:16 a.m. there's an outgoing call to David Green from Egho's
3 cell phone. At 7:20 and 7:21 a.m. there are calls going to and
4 from Leevensky Lambert. Egho is moving in the direction of the
5 Motel 6 that they stayed in afterwards, but the package is
6 delivered at 7:04 a.m., which places Egho right in the vicinity
7 of 3016 Kenyon Avenue.

8 Count Seven, 761 Melville Avenue, January 19th of
9 2019. The victim here was Mr. Charles Carper and he lost
10 \$10,000. Again, we return to the same set of notes for David
11 Green. Again, these are one day after -- this is the next day
12 after Count Six of the January 18th delivery to Kenyon Avenue.
13 And here we have: Egho, five pickups total. Saturday, two
14 packs at -- and this says 761 Melville Avenue. When you look
15 further down there's a mention of 761 Melville under Keion's
16 name.

17 Use your common sense, ladies and gentlemen, when
18 you're reviewing the evidence. Do people make typos? Do they
19 transpose numbers? So let's take a look at the next piece of
20 evidence related to Melville Avenue. We have Egho's cell phone
21 in the area of Melville Avenue from 8:31 through ten o'clock
22 a.m. The delivery for that specific package for -- again, this
23 is Mr. Carper that arrived at 9:52 a.m. But as the note
24 reflects, there's a number of different deliveries. Egho's cell
25 phone is in that area for about an hour and a half. He calls

1 David Green four times and Levensky Lambert once. And again,
2 this is January 19th, 2019. And you heard from both Mr. Lambert
3 and from Mr. Green about their extensive involvement in the
4 package scheme at that time. So those are the substantive mail
5 counts.

6 Now, I mentioned that I was going to turn back toward
7 the conspiracy towards the end of my closing argument. Now,
8 there's this message, which is earlier on in the conspiracy,
9 it's in October of 2018. And this is a message that Egho sent
10 to McArnold Charlemagne. Now, in October of 2018, you heard
11 from a number of our witnesses that Jay had gone missing. And
12 Jay being the person in charge, things were a little bit in
13 question as to what was going to happen.

14 Mr. Charlemagne told you that he received a number of
15 messages from Egho. We picked one of them to show you. And
16 what I think is important is sort of the middle portion of this
17 message. It says -- and it's clear when you start reading the
18 message that he's talking about Jay. But we start in the middle
19 where it says: He told his workers get 40 official addresses,
20 or address that they were supposed to send to him Saturday night
21 so they can have work for this week coming up. But they never
22 got a chance to send it in because he stopped answering. And
23 you'll recall, again from Mr. Charlemagne, they talked about how
24 there had to be a certain number of addresses sent on the
25 weekend, so they knew where to send the packages to the

1 following week.

2 "I wanted to fill in the gap for him until we find him
3 because I know that's what he would ask of me."

4 Egho was stepping up. He was going to fill in the gap
5 for Jay. And this was in October of 2018 when he is making his
6 assent in the organization.

7 At the beginning of the conspiracy Egho earned himself
8 a position in this organization and a lot of good will with Jay.
9 Because think about what you heard about the first package that
10 arrived to Egho's house. He found out that it was missing
11 money. You heard the testimony from Mr. Charlemagne, who heard
12 the story from two different people: One from Jay, one from a
13 friend of Egho's. When the package was given to Jay it was
14 discovered that money was missing. So what did Egho do?
15 Mr. Charlemagne told you, again from the mouths of Jay and
16 friend of Egho, that Egho decided to take matters into his own
17 hands. He roughed up his own mother to get that money back.
18 That earned a lot of trust with Jay.

19 When Jay was absent, because he had been arrested,
20 Egho told Charlemagne that he was going to take over. You just
21 saw that message. When Egho was arrested in Florida in February
22 of 2019, Jay told Amaya that he was impressed by the fact that
23 Egho didn't say anything to law enforcement. Egho knew exactly
24 what he was doing.

25 This was a big scheme. You heard about that from

1 Mr. Charlemagne. After the package got sent to Dr. Grant's
2 house, they had a conversation. Mr. Charlemagne told you that
3 he and Egho talked about it for some time. They knew that they
4 were tricking people at that time. This was in July of 2018.
5 Egho told some of the witnesses that he didn't care about the
6 fact that he was involved in a fraud, he was going to keep doing
7 it. After he had been arrested for state court, he then kept on
8 doing it.

9 Ladies and gentlemen, Egho is guilty of the
10 conspiracy. He is guilty of all four counts of mail fraud.
11 Find him guilty of all four counts of this case.

12 Thank you for your time and attention.

13 THE COURT: Thank you very much, Ms. Goo. Thank you.

14 And with that, closing argument from defense counsel.
15 Mr. Guillaume.

16 MR. GUILLAUME: Your Honor if I could have about two
17 minutes. You can stay, I just want to be able to set up.

18 THE COURT: Sure. Take your time. Take your time.

19 Thank you, Mr. Kerrigan for assisting Mr. Guillaume.

20 And with that Mr. Guillaume be glad to hear from you.

21 MR. GUILLAUME: Thank you, Your Honor.

22 Good morning, ladies and gentlemen.

23 THE JURY: Good morning.

24 MR. GUILLAUME: Thank you for -- before I get started,
25 I want to thank you for your time and attention and reiterate

1 what I said in the opening. That without your assistance,
2 without citizens like you no one could receive a fair trial in
3 this country. So whatever your verdict ends up being, we all
4 thank you for your time and for your service.

5 Now, of course, I represent the person that's known as
6 Eggho. Affectionately as Eggho. I am going to ask you -- I am
7 asking you to find him not guilty and I'm going to explain some
8 things to you from my perspective.

9 As the judge will instruct you on the law, you haven't
10 quite heard all of the elements that are required, what exactly
11 the law is in this case. You may be thinking to yourself, well,
12 there's a lot of evidence the government has presented. So some
13 of you may have already made up your mind, and I would be silly
14 to think that you hadn't. I have been doing this a little bit
15 too long to think otherwise. But I also know that there's some
16 of you that are going to -- that have not yet made up your mind,
17 and when you all get together and collectively discuss you're
18 going to come to a unanimous verdict, whatever that verdict is.
19 I just ask -- excuse me. I just ask you, and my client asks you
20 that you keep an open mind and listen to my argument as I
21 explain why my client should be found not guilty.

22 Now, I'll start off by reiterating something else that
23 I said in opening as well. I said one, you're going to hear
24 from people who know my client. We didn't deny that for a
25 second. And two, we're not going to deny the fact that this

1 fraud happened to people, elderly people, and I'm going to touch
2 upon that in a second.

3 And one of the other things I said as well was that
4 it's just a natural human reaction to want to protect a child,
5 someone who is viewed as frail, someone who is elderly. That's
6 a natural reaction. But your job as a jury is to apply the
7 facts in this case to the law that has not yet been explained to
8 you.

9 I'm going to reference some of the law but not all of
10 it. Ms. Goo referenced some of it but not all of it. Judge
11 Bennett, as I said, and I agree with him, you'll soon find out
12 that the part where you get the law explained to you -- on TV
13 the rating would plummet because it's very long. But you know
14 what, it's very important.

15 You're going to have a copy of the law. You're going
16 to be able to apply the law to the facts. There's some of you
17 who are going to have differing views, but my hope is that you
18 will come together for a unanimous verdict. And, of course, I
19 am asking you to find my client not guilty.

20 You also will be told, or you have been told, I can't
21 remember, that the lawyer's argument is not evidence. So what
22 Ms. Goo just said to you is not evidence. What I'm saying to
23 you now is not evidence. But what we try to do as lawyers is to
24 argue from the evidence. Evidence being the testimony of the
25 witnesses. I'm going to focus a lot on that. Evidence being

1 the exhibits that you've seen. The government focused a lot on
2 that in their argument. So all of these things are considered
3 evidence and you're the only ones -- not us, not the judge --
4 you 12 people are the only ones that will decide how much
5 significance, if any, to give any particular piece of evidence.

6 So I'd like to get started talking about this, some of
7 the players that we've heard about over the last few days.

8 I have a technical malfunction right now. There we
9 go.

10 The first person is the person that everybody is
11 referring to as Jay. His real name is Medard Ulysse. What do
12 we know about this person? He didn't testify in court, but we
13 learned a lot about him; feels like he was here. We know that
14 he introduced everyone involved to this package scheme. We know
15 he was physically abusive, abusive toward women. We know that
16 with Amaya English. She was a child, 18 years old, when she met
17 him, he was in his 30's, and yet they got involved in a romantic
18 relationship.

19 We heard from another woman yesterday who was my
20 witness, Ms. Jones in Florida who was also abused by Mr. Ulysse.
21 Why is this important? Because Mr. Ulysse, we learned, ruled
22 with an iron fist. He took a group of young people who were all
23 in their early 20's, and some even younger, and had them work
24 for him in this scheme. And we learned that one of the rules
25 that he had -- we learned this from Mr. Lambert -- was that if

1 you don't get a package, if one person doesn't get a package
2 then nobody gets paid. I hope you remember that, because that
3 struck me as someone who has really got control over people.
4 Young people in particular. We also know that he was very
5 flashy. That's how Ms. English remembers him. He drove a lot
6 of fancy cars and expensive -- he wore expensive clothes. He
7 had an apartment in the very affluent part of Washington, D.C.
8 We also know that he has international business partners.
9 That's important to remember too.

10 Now I want to review the testimony of certain
11 witnesses, and this is not, of course, all of what they said,
12 these are some of the things that I thought were important for
13 you to recognize, but your memory is going to control. And
14 hopefully you took notes to remind yourself of some of these
15 things and hold me to -- hold me accountable. Keep me honest.
16 If you don't remember them saying this, your memory controls.
17 But I'm pretty sure that I took pretty good notes too, and these
18 are what these folks said. Again, it's not all of what they
19 said but some of the important factors.

20 Mr. Lambert testified that Jay and Zo, who is known as
21 Mr. -- who is Mr. Charlemagne, and actually Mr. Lambert was also
22 known as Zo. We learned that was kind of a Haitian nickname,
23 but the person that's referred to as Zo for the most part is
24 Mr. Charlemagne. Mr. Lambert learned about the business from
25 those two individuals. He learned how to do the operation from

1 Mr. David Green. We heard he was at a party one night, and
2 literally the next day flew to Baltimore from Florida. And Mr.
3 Lambert, what he testified to that I found very important, was
4 the level of detail that was involved with respect to these
5 packages. He said the information that was normally received
6 was a tracking number, name, date, the sender's name, and the
7 address. They had all this information, which I'm going to
8 continue to refer to and you'll see a little bit later why it's
9 so important. But Mr. Lambert testified that he never opened
10 any packages himself nor did he see my client open any packages.

11 You may have said, well why am I, me, the attorney,
12 asking the same questions over and over again. Because I'm
13 trying to establish a pattern; a pattern which was not broken
14 with any witness, okay. When Mr. Lambert testified about my
15 client, as far as his knowledge of what was inside the packages,
16 my client says, according to Mr. Lambert, he doesn't know. And
17 Mr. Lambert stops working after he's arrested in Florida. Now
18 that is a pivotal part of this case, and you're going to hear me
19 talk about that a lot. But that's just -- just to get kind of a
20 summary of Mr. Lambert's testimony, those are things that I felt
21 were important.

22 Now, Mr. Paliwal also testified. Mr. Paliwal was in
23 this thing, also a young man, a teenager, or barely 20 years
24 old, who thought he could make music with Jay. And actually
25 flew to Philadelphia, D.C., and back to -- home, went back to

1 New Jersey and never made one bit of music. But at some point,
2 he got involved in the package stuff as well. He also did not
3 see my client open any package or discuss what was inside. And
4 what's -- one of the things that's kind of important about his
5 testimony, even though he was short and wasn't around as long,
6 is that he says when he returns to Florida it would have been
7 the end -- you may remember me asking this the other day. I
8 wanted to really nail down the time frames. He said that he
9 returned -- we know -- I don't remember this, but there was a
10 ticket that was purchased for him October 1st, 2018. He went
11 from Florida to -- he says D.C., and then he traveled to
12 Philadelphia. He goes home. We don't have any of the return
13 tickets, but he and his friend, they return. And then about a
14 month later, November the 1st, he's right back in Newark where
15 he says my client and other people pick him up. They go buy
16 this car -- I don't know if you remember that -- in the middle
17 of the night. It's one o'clock in the morning. It's kind of an
18 interesting story. Didn't really matter, but it was kind of
19 memorable.

20 So -- and then he says he returned -- he realizes,
21 like, I don't want to do this, I don't like this. Whatever his
22 reasons are, at that point he goes back to Florida. Now his
23 time was a little off, so I really was like, what's the time
24 that you're -- you know, was it -- were you in Florida for the
25 new year? Were you in Newark? He says he believes that he

1 returned back to Florida prior to January 1st, 2019.

2 But when he got back to Florida, he says that people
3 reached out to him, three people -- he says my client, Jay, and
4 Charlemagne -- to come back into the fold. Now, again, we're
5 talking about January 2019. I'm focusing just on what --
6 Mr. Charlemagne for a second, and I'll get to him in a minute
7 because I have a lot to say about him. But if Mr. Paliwal, who
8 we have no reason to believe is lying, says that in the end of
9 2018, beginning of 2019 Mr. Charlemagne contacted him --
10 Charlemagne testified that he was done at the end of 2018,
11 right? But he's calling him recruit -- calling Paliwal
12 recruiting him back in, that gives me a little bit of pause
13 about Mr. Charlemagne, for lots of other reasons as well.

14 Now, at first, he said it was -- Mr. Paliwal said it
15 was in the fall of 2019, which is why I noted that on my
16 presentation. But if you remember, when I said was it the fall,
17 because in the fall of 2019 that's when everyone gets arrested,
18 okay. So I said -- I really wanted to know, I didn't want to
19 put words in his mouth. He says, well, I don't remember
20 exactly, but it was a couple months after I got back. He didn't
21 really remember the time frame, but it's more reasonable to
22 believe that if he had just left, he would be getting a call
23 within the few months or a month of him leaving versus almost a
24 whole year later.

25 So we also heard from Mr. St. Juste who is another

1 person who Mr. Lambert knew, who was a friend of his who was
2 actually recruited by Mr. Lambert. Some of the things that he
3 talked about was that he also did not know what was inside the
4 package. He did not see my client open any package. He didn't
5 testify that my client told him about the contents of the
6 package or the origin of the package or what was inside. He
7 also said what Mr. Lambert kind of said. That with respect to
8 the information that he was receiving was a name, address,
9 location. He would receive this stuff via text message. And a
10 lot of this was through encrypted phones, through -- not
11 encrypted phones, excuse me, an encrypted application on a phone
12 known as Wickr.

13 Now, even the FBI agent didn't know what Wickr was.
14 Did you guys catch that? Because I said -- have you heard --
15 and he's an expert, okay, he knows a lot about phones, he had
16 never heard of Wickr. So this is something -- and Jay used this
17 to communicate. He told all of his workers to use this. So if
18 -- and seems like in this case they may be one step ahead of --
19 even today, because this is five, six years later -- ahead of
20 the FBI.

21 So the bottom line, what I'm trying to make with that
22 is that there's lot of stuff that was hidden on this that we'll
23 never know what was said one way or the other; addresses,
24 whatever the case may be. But this is supposed to show you the
25 sophistication of Jay and the people he's working with.

1 Now, Mr. St. Juste was in it for, I think, about a
2 week or less. He said he just -- he stopped working with the
3 group, that it was prior to February of 2019.

4 Now, Kamesha Jones is a witness that I called in my
5 case to give you guys -- to show you the breadth, and kind of
6 Jay's influence. She was romantically involved with Jay in 2018
7 to 2019 she testified, which would have been the same exact time
8 that Jay was involved with Amaya English. Besides that making
9 Jay not a bad guy, just generally speaking, but for another
10 reason, he was also abusive to her. He choked her. And
11 unfortunately, you know, it's -- he choked her. But she also
12 assisted him in his business. She opened packages with him, she
13 counted money with him. She knew. She was in Florida, so she
14 knew what was inside the package. She even picked up packages
15 herself. She surmised that he was working with people in Canada
16 because he spoke French on the phone with them. Whether they
17 were from Canada or where, it doesn't matter. But the fact of
18 the matter is, she spoke -- it could have been in Morocco, it
19 could have been France, it could have been Guadeloupe, who
20 knows. Could have been in Haiti. Didn't really matter. But
21 she knows.

22 She was speaking business with him about what he was
23 doing in French and English. Doesn't understand French but
24 understands English. She safeguarded money for him; \$75,000
25 cash one time. She even booked hotel rooms for him, flights for

1 him and other people whom she didn't know. Had no idea. So it
2 shows the people to whom he's involved. And you're going to
3 say, well, what does all that mean with respect to your client?
4 why are you telling us this? Just give me some time, I'll let
5 you know.

6 Ms. English testified, who, of course, was
7 Mr. Ulysse's significant other in this part of the country,
8 Maryland. She's from Baltimore. We know he was also abusive
9 towards her. She also opened packages, counted money with him.
10 And we -- she also said, too, without saying it this way, that
11 he was very possessive and controlling over her. She didn't let
12 him interact with other people. So this is very important
13 actually.

14 She testified when I asked her -- this is on
15 cross-examination, right. She gave the -- just so we're clear,
16 she gave the opinion that my client was still doing work with
17 this operation after the Florida arrest, okay. She gave that
18 opinion. We didn't run from that. But when I -- she gave -- on
19 direct examination. But on cross I dug into it a little deeper.

20 I said: well, when did you stop working? She said
21 she was done in the end of 2018, okay. She wasn't privy to what
22 was going on after that, but she still dated him, but she wasn't
23 privy to the business.

24 She never had a conversation with my client about the
25 source of the money, right, in these packages. So the fact of

1 the matter is, Ms. English testified but -- that my client was
2 involved after, but what details did she give? Because one of
3 the things -- and I probably should have talk about this the
4 very first thing, and you're going to hear about it in a second
5 from the judge -- is that the burden of proof is on the
6 government to prove this case beyond a reasonable doubt. You
7 cannot just say, well, I guess he was doing it because we were
8 all doing it and he was doing it after that time. That's not
9 good enough.

10 In this case, and I'm kind of jumping ahead in my
11 argument, I want to make a point here. Is the government has
12 given you very, very, very specific information; tracking
13 numbers, hotels, flights, et cetera. They can pull your phone
14 and track it -- it's very impressive actually -- and track you
15 to where a package is, and there's really no doubt that you were
16 there. I'm not even -- that's beyond a reasonable doubt, okay.
17 But what is not beyond a reasonable doubt is someone saying,
18 yeah, he was working in the package scheme at that point. well,
19 she had stopped so how does she know? But there's other reasons
20 as well.

21 So, Mr. Green. Mr. Green also testified that my
22 client was working with him throughout, okay. But I want to
23 really delve into Mr. Green for a minute. Mr. Green, we know,
24 was arrested in Delaware in 2019. With a juvenile in March of
25 2019. Let me be very specific about that. With a juvenile that

1 he recruited to work with him. He was arrested and got charged
2 in the state. You heard the call from jail of him crying to his
3 girlfriend in Florida about potentially having to spend time in
4 jail. He claims, without proof, that my client continued to
5 work with him after the Florida arrest.

6 Now, do you see a theme in my argument here? It's
7 after Florida everything changes. After Florida everyone knows.
8 Like, there's newspaper articles. There's all this -- there's
9 news coverage about oh, this is what was called, quote/unquote,
10 a granny scheme, an elder scheme, okay. And that's the point
11 when people have knowledge of what's going on, including my
12 client. And you'll soon see how I'm going to put this all
13 together.

14 Now, he says, interestingly enough, that he didn't
15 tell authorities about my client when he first got arrested
16 because they'd been friends, and he minimized his involvement,
17 or didn't say it at all, I don't remember the words that he
18 used. But, you know, what we established yesterday as well is
19 that Mr. Green was arrested in 2019. Mr. -- Egho was arrested
20 in 2021. And why is it important? I'll tell you why, get to it
21 in one second.

22 But I want to talk about first my friend
23 Mr. Charlemagne. And I say friend facetiously for the purposes
24 of the record. Mr. Charlemagne. who is he? Let's -- of all
25 the people here, I think he's the closest person to Jay without

1 the abuse. Mr. Charlemagne is a career criminal. There's no
2 other way to say it. He's a career fraudster. You're going to
3 get a jury instruction that talks about assessing the
4 credibility of a witness, okay. For example, you know, you can
5 say this witness was very believable, this witness was not, or
6 whatever the case may be. Or portions of their testimony were
7 not.

8 Mr. Charlemagne engaged in separate -- a separate
9 scheme altogether; wire fraud where he was depositing money in
10 accounts and going to get 15 percent. And one time there was a
11 \$90,000 wire. It was him, Jay's uncle, and Jay.

12 He admitted to making fraudulent car titles using a
13 PhotoShop Program. He later denies it. First, he said yes, and
14 then he said no. So it -- to that I'll say, if somebody accuses
15 of you doing something like that and your first answer is yes
16 and then you say oh, no, it wasn't me, then you be the judge of
17 that.

18 So this is interesting as well, and it's a minor point
19 but it's not that minor because this goes to the overall
20 character of the person that's testifying. He said that he
21 turned himself -- do you remember this? He said he turned
22 himself in in Miami. He called the next day. Next day, Miami I
23 turned myself in. Well, turns out that Special Agent Bender,
24 who was part of this arrest, testified, credibly, that he was
25 notified to turn himself, that he was in New York, Charlemagne

1 was in New York, and he would turn himself in. He finally did
2 turn himself in Baltimore the next day. Now, I don't know who
3 here has been to Miami, but this is not Miami. I mean, we all
4 love the city but it's not Miami.

5 So that's a big difference. He was also promised by
6 Jay that he would make \$1.2 million from the scheme. He also
7 rented an apartment in his name in this affluent D.C.
8 neighborhood; in his name for Jay and paid the rent every month.
9 He also had direct contact with Jay's bosses. So of all the
10 people that you heard about he is the only one -- he's on the
11 same level as Jay. And what was interesting to me about
12 Charlemagne is that he started talking about -- we cut him off
13 -- about going to his lawyer's office and all this stuff. He's
14 smart enough to know that oh, wait, hey, I'm going to get out
15 while the getting is good. But he claims he stopped working in
16 2018 in this thing.

17 But again, like I said earlier, Mr. Paliwal asked him
18 to return to the conspiracy. That's what Mr. Paliwal said that
19 he was one of the people that supposedly called him. So you be
20 the judge, okay? One person says one, one person says another.
21 He says he has no dealing with Jay after 2018. That's just
22 simply not true.

23 He claims he had -- so let's talk about this
24 conversation that he has with my client, or about my client. In
25 spite of what you are being led to believe, my client loves his

1 mother, okay. He didn't assault his mother. That sounds
2 ridiculous. And the fact of the matter is, nobody saw this. So
3 at best, it's an urban legend. My client loves his mother. And
4 I don't even want to address that. It's silly but it's been
5 brought up a number of times, so I feel like I have to.

6 Anyway, back to Mr. Charlemagne. Him and Charlemagne,
7 the uncle that I referred to earlier named Pierre, when Jay goes
8 missing -- because he does go missing -- who contacts
9 Charlemagne? The people who are running this thing from another
10 country potentially. They contact Charlemagne. Why? Because
11 Charlemagne and Jay are equals, okay. They contact Charlemagne,
12 and there is a potential for a business -- for Charlemagne to
13 become -- for Jay to be excluded. Who else would have that?
14 Nobody. That's not my client, not David Green, not Amaya
15 English. No one but Charlemagne has that potential power. And
16 then we find out that Jay later assaults him. Now he kind of
17 equivocated on why and what the reason was for the assault, but
18 we know that Jay beat him up for that, or something else.

19 Now, there's been a number of people that you -- you
20 may have remembered the government in opening, Mr. Delaney,
21 saying -- I'm sure he'll probably say it again if he gets up
22 here again -- that they didn't choose these people. That these
23 are, you know, who else are we -- who else are we going to talk
24 to but the very criminal themselves? Of course they're not
25 saints. I've heard it before, but that's not to say that it's

1 not relevant, okay. Because there are certain people who are
2 positioned differently. So we can break them down one by one.

3 Mr. Green, he was charged in March of 2019. March is
4 after the February arrest when everybody becomes aware of what
5 exactly the scope of this thing is. That's very relevant. He
6 also took four days to turn himself in. The federal -- the FBI
7 comes knocking at your door and you take four days to turn
8 yourself in? I know people a lot more famous than him who the
9 FBI is looking for that don't take that long. But he did. Why?
10 Because you heard him on the phone. He didn't want to go to
11 jail. Who does, but especially not him.

12 Now, Ms. English, she was arrested by federal
13 authorities in August of 2019. Now, remember, she had stopped
14 working at the end of 2018, but she said that Jay called her,
15 there was nobody around, they didn't have people to do a package
16 or whatever. And she did it, begrudgingly, and then she got
17 nabbed immediately. So that's also after February 2019.

18 McArnold Charlemagne, we've talked a lot about him. I
19 don't want to repeat a lot of what I said, but his creditability
20 is completely obliterated in my opinion.

21 And then there's my client. My client was charged in
22 March of 2021. So we have -- in particular, this is relevant
23 for Mr. Green's purposes, he's almost charged two years later --
24 or two years after, because in December -- in August that's when
25 all the folks are arrested it seems like based on the evidence

1 that we've heard.

2 So the people that did not get charged federally, for
3 whatever -- one reason or another, is Mr. Paliwal. He stopped
4 working pretty early on. Mr. Lambert, he was short-lived. And
5 Mr. St. Juste, the same. Kamesha Jones, she worked with Jay
6 directly. She's the one person that's different out of this
7 group. She actually counted money with him and opened packages,
8 and the other three persons that I have listed before did not.
9 But what they all have in common is that they all were operating
10 prior to February of 2019. All these folks were doing stuff
11 prior to February of 2019 when the arrest in Florida happens.
12 The other group of people that I just mentioned, I'll go back to
13 them, these people all did something, at least one thing, after
14 February 2019.

15 Now, the government is going to tell you, they already
16 said it, my client is one of those people. We disagree, and
17 I'll explain why I believe that. There's this tracking number
18 in March, okay. This is the government's alleged smoking gun.
19 My client sends a tracking number to David Green, but there's no
20 context given with this. Ms. Goo, when she just got up here a
21 minute ago, there's no context in with that. Look at the
22 exhibit, it's 27, 27-A. Look at it. You tell me what the
23 context is, okay.

24 We know that in part of this exhibit there's an
25 attachment for a customer, UPS Customer Care. There's no

1 significance of it so I'm not gonna sit here and guess what it
2 means, okay. Ms. Goo showed you the invoice at UPS and there's
3 an associated address, but there's been no testimony as there
4 has been in lots of other cases about any associated loss in
5 particular. No other details of proof beyond a reasonable
6 doubt.

7 we also know it's in Pennsylvania. My client was
8 living in Pennsylvania at the time. But compare it with the
9 other examples that you have been given, right. And we're
10 talking about proof beyond a reasonable doubt. Does it raise
11 your eyebrows because of all the other stuff? Maybe it does.
12 You know, I'm not going to sit here and insult your intelligence
13 and say it doesn't, but is it proof beyond a reasonable doubt.

14 So when you're analyzing this case, one of the things
15 that you should be talking about is what happens after February?
16 Let's look at all -- if you start there -- in my humble opinion,
17 if you start there, I think that's a good starting point. What
18 happens after February in this case when everybody has
19 knowledge?

20 So this is an instruction of -- that I have very
21 narrowly -- well, I've tailored it down a lot to focus on what I
22 want you to focus on, obviously. But ladies and gentlemen, I'll
23 say this to you: A conspiracy to steal a package, which is
24 what's -- there's no doubt -- look, my client was there every
25 time they said he was, okay, but he didn't have knowledge of

1 what was in -- what was the origin of what was going on, okay,
2 and that's the key here.

3 I don't want to insult your intelligence; I don't want
4 to waste your time. We're not here to say oh, it's his phone,
5 not his phone. Look, a conspiracy to steal packages is not
6 equal to conspiracy to defraud the elderly or a fraud scheme.
7 All you have to do is look at the elements which -- don't take
8 my word for it, you're going to get them explained to you in a
9 second and you'll have it in black and white when you're
10 deliberating.

11 So, when you look at that and you apply it to the
12 facts, the government misses the mark on this conspiracy charge.
13 Because just looking at this one factor that I thought about as
14 I was sitting there a minute ago, and I wrote it down. The last
15 thing I wrote here with respect to the callers, they -- it's a
16 very sophisticated operation, obviously. The persons who are
17 being -- and you may have noticed my questions with the victims
18 were all the same. Did you think this was actually your
19 grandson or granddaughter? Did you actually talk to them?
20 Their answer was almost always yes, I believe, and they knew
21 their names. I asked Mrs. Ricci that yesterday, they knew their
22 name, her name, her grandson's name. I mean, that is an extreme
23 level of sophistication that my client, in his part of this,
24 didn't have, and the knowledge that he didn't have.

25 Now the government's going to say well, he's --

1 there's other people working other parts of the conspiracy and
2 not everybody has to do everything. They're right. But there's
3 also, when you look at the instruction as a whole, and this is
4 not the instruction as a whole, you will see that there's
5 something missing. And just apply the facts to the case.

6 And again, for mail fraud it's a very small subsection
7 of the overall instructions that you're going to be given of the
8 law. But in the second element, and I think Ms. Goo talked
9 about this a moment ago, the government must prove that my
10 client knowingly -- knowingly and willfully participated in the
11 scheme to defraud. That is the scheme to defraud these people
12 of this money, with knowledge -- and that's the key here, it's
13 knowledge of its fraudulent nature. So stealing a package off
14 of a porch is different. It's theft, it's not this. And the
15 specific intent to defraud.

16 Now, in rebuttal they're probably going to say well,
17 Charlemagne said they had this discussion and Charlemagne said
18 that they knew, and he knew. What does Charlemagne actually say
19 though? Charlemagne makes up a story about my client allegedly
20 assaulting his mother. And then and the government has
21 conflated -- has conflated the story of Mrs. Ricci and Dr. Grant
22 being one in the same as the conversation that was allegedly had
23 by Charlemagne and my client.

24 First of all, if you even believe that conversation
25 occurred, and I'm not saying it did, but let's just assume for

1 purposes of this conversation that it did occur. Charlemagne
2 said they were in D.C. when it happened and it was some
3 involvement with the D.C. situation, not the Florida case. He
4 -- Charlemagne was kind of all over the place. He would say one
5 thing and then he would say another. And it just -- he wanted
6 to give the answer that I think suited his purposes the best.
7 But again, my argument does not control, your memory controls.
8 But the instruction also says -- one part of the instruction I
9 see at the bottom here, is that if you find the defendant was
10 not a knowing participant in the scheme, or that he lacked the
11 specific intent to defraud you should find him not guilty.

12 There's other instructions that are -- that will be
13 given to you about association. So the fact that my client
14 associated with these folks after the Florida arrest, right,
15 because David Green is his friend, his childhood friend, okay,
16 does not automatically make him a member of a conspiracy. And
17 again, we're talking about a conspiracy. This is not to take
18 packages but the government's alleging wire fraud. It's not a
19 conspiracy to be associated with anyone. Not a crime if he
20 knows someone is doing a crime. If I know that you're doing a
21 crime and I don't do anything about it, it's not -- nothing can
22 be done to me.

23 Now, Ms. Goo makes a big deal about the fact that he's
24 from Florida and he's a -- why is he here. Well, let me just
25 tell you. As you may have known from some of my questions, he

1 met a woman here that he ended up getting married. They were
2 going back and forth. He eventually relocates to Pennsylvania.
3 That's why he's here. But part of the reason why is he's
4 working with Jay, again, I'm not going to insult your
5 intelligence, but he's in the same boat as Lambert; he's in the
6 same boat as St. Juste and those people.

7 Now he has an added responsibility, allegedly,
8 according to Mr. Green, of counting money. But so did Ms.
9 Jones. Counting money and knowing money is there doesn't -- you
10 got to get one step further. You've got to know. It can be
11 money from anything; money from drugs, money from arms, money
12 from who knows what. That is important.

13 Again, the law explains to you that the mere knowledge
14 of a crime without participation is unlawful. Is -- excuse me,
15 is not in -- the unlawful plan is not sufficient. So where is
16 the proof? Again, we're talking about proof beyond a reasonable
17 doubt that my client participated in the package scheme after
18 the Florida arrest. So look -- again, as I said a moment ago,
19 start there and you'll see the text messages exchanged with
20 Mr. Green. And then you'll say, well, let's go back, what about
21 before? But he's in the same -- it's not a coincidence that the
22 other people that I mentioned, the ones that are not charged,
23 are the ones -- all their sins were committed prior to Florida.
24 Once Florida happens, everything changed. And that's including
25 -- and that includes my client as well.

1 Ladies and gentlemen, your role as jurors, as I've
2 been kind of harping on, is to perform your duty without a
3 finding of fact, without bias or prejudice to any party. These
4 folks were victimized. They're some of the most vulnerable
5 members of society, I acknowledge that, but you cannot -- I
6 implore you to not let that fact get in the way of assessing
7 this case and applying the law to the facts.

8 I also implore you, if you have -- whatever your
9 belief is, one way or the other, to not simply give in to a
10 fellow juror for the sake of wanting to go home or wanting to be
11 done with this case. And I don't think that you will, but I say
12 that in every case, because I really want you to assess all of
13 this evidence, I think the government does too; I think it's
14 probably the one thing we agree on and apply the law as you see
15 fit.

16 I am asking you to find my client not guilty of these
17 charges. I thank you again for your time and for your service.
18 I truly appreciate it. I won't get a chance to talk to you
19 anymore, probably ever, but it's been a pleasure. And the
20 government now has the opportunity to rebut what I'm saying
21 because they have the burden of proof. And thank you again.

22 THE COURT: Thank you very much, Mr. Guillaume.

23 And ladies and gentlemen, with that, we will take
24 about a brief ten-minute recess and then we'll hear rebuttal
25 argument from the government, and then I'll give you

1 instructions on the law. So we'll stand in recess for about ten
2 minutes.

3 THE CLERK: All rise. This court's in recess.

4 (Jury out at 11:23 a.m.)

5 (RECESS was taken from 11:23 -11:39 a.m.)

6 THE COURT: Bring the jury back in. Have rebuttal
7 argument and then instruct the jury.

8 (Jury entered courtroom at 11:40 a.m.)

9 THE COURT: Thank you all. You may be seated.

10 And with that, Mr. Delaney, rebuttal on behalf of the
11 government.

12 MR. DELANEY: Thank you, Your Honor.

13 Ladies and gentlemen, when I first spoke with you last
14 Friday, I asked you to put us to our proof; to make the
15 government do its job. And now, one week later, we have done
16 just that. You have been presented with overwhelming evidence
17 of the defendant's guilt and you have been paying careful
18 attention, we can all see it. We thank you for that. I ask you
19 now to hang in just a little bit longer with us.

20 Just a few moments ago, as Mr. Guillaume argued that
21 Eggho didn't know the money in this scheme came from elder fraud,
22 that key details were kept from him, and that the higher ups,
23 Jay and the mysterious international business partners, kept
24 things from him. There are a number of things wrong with that
25 argument.

1 First, it demonstrates an incomplete understanding of
2 the law, of which you will be instructed just very shortly. And
3 a reminder, what I say is not the instruction, what Judge
4 Bennett says is the instruction. If I get it wrong, he's right,
5 I'm wrong. But what I believe you'll hear is that before a
6 defendant can be found to have been a conspirator, he must first
7 find that he knowingly joined in the unlawful agreement or plan.
8 The key question, therefore, is whether the defendant joined in
9 the conspiracy with an awareness of at least some of the basic
10 aims and purposes of the unlawful agreement.

11 A defendant's knowledge is a matter of inference from
12 the facts proved. In that connection, I instruct you that to
13 become a member of a conspiracy the defendant need not have
14 known the identities of each and every member, nor need he have
15 been apprised of all of their activities. Moreover, a defendant
16 need not have been fully informed as to all the details or the
17 scope of the conspiracy in order to justify an inference of
18 knowledge on his part.

19 And I'll just continue here. Some conspirators play
20 major roles while others play minor parts in the scheme. An
21 equal role is not what the law requires. In fact, even a single
22 act may be sufficient to draw a defendant within the ambit of
23 the conspiracy. But, of course, Mr. Guillaume's argument
24 ignores all of the evidence that proves defendant's knowledge in
25 this case of exactly what was going on. So let's walk through

1 some of that evidence.

2 You've got David Green's testimony about his February
3 2019 conversations with Jay and Egho, and then subsequently with
4 Egho. In that conversation, first, David Green testifies that
5 Jay confirmed the package pickups in Baltimore were related to
6 those news reports. And Mr. Green testified, I think, that Egho
7 wasn't surprised. He said, and your recollection controls, just
8 body language, facial expression, almost like he had known.
9 And, of course, as we'll discuss in more detail momentarily, the
10 evidence has shown that Egho did know. It was David Green who
11 was apparently kept in the dark by his old friend. The one he
12 called when he got locked up. Crying.

13 And, of course, the evidence has shown that Egho
14 remained a willing member of the conspiracy after that moment.
15 And that's not just a tracking number. That's -- we don't have
16 one smoking gun in this case, we have plenty of smoking guns in
17 this case. The fact that he remained in the scheme is
18 corroborated, yes, by that tracking number, but also with texts
19 of David Green about the New York City drop-off of cash in March
20 of 2019, the day before David Green got arrested.

21 And it's corroborated by the testimony of Sooraji
22 Paliwal who, my recollection, testified that their conversations
23 took place after the arrest. That Egho was still reaching out
24 to him. Remembering your recollection controls, not mine. As
25 well as the testimony of Amaya English about conversations -- or

1 about what she observed about Egho's involvement in the scheme
2 after that arrest.

3 But Mr. Guillaume then moves to -- I believe he said
4 once Florida happened everything changed. Nope, that's not what
5 the evidence shows. No. The evidence shows that Egho had
6 knowledge way before the arrests in Florida. Way before those
7 arrests in Florida Egho knew what was going on. And you knew
8 that first from the testimony of McArnold Charlemagne.

9 You'll hear an instruction on witness credibility.
10 You determine whether the witness was credible. I don't
11 determine it, defense counsel doesn't determine it, you make the
12 determination. You can determine if McArnold Charlemagne was
13 testifying candidly pursuant to his agreement. You can consider
14 that he was corroborated by five other witnesses who were also
15 co-conspirators.

16 Being too loud.

17 You can also consider that he was corroborated by
18 other non-co-conspirator witnesses, and you can consider all of
19 the documentary evidence that corroborates him, and you can make
20 that determination.

21 He testified that his conversation with Egho was when
22 he got an idea of what was going on in the scheme. It was a
23 conversation with Egho, after Egho confronted someone with a
24 package. Yes, I think the evidence indicates it was Arlene
25 Grant, who actually testified here, but if it wasn't Arlene

1 Grant maybe it was somebody else. It happened more than once.
2 Either way, McArnold Charlemagne testified that after this
3 conversation he became aware that they were convincing people to
4 send packages. I might argue the word was conned. Regardless,
5 Ms. Goo, if you were paying attention, which I know you were,
6 did an excellent job on following up with Mr. Charlemagne. What
7 did he mean by convincing? And what he said was tricking.

8 McArnold Charlemagne learned this from a conversation
9 with the defendant back in the summer. He gave a range, I
10 think, of June to September 2018. Arlene Grant happened July
11 2018. Seems to line up just fine to me, but that's not the only
12 evidence you have of the defendant's knowledge prior to the
13 Florida arrests. You've also got the testimony of Sooraji
14 Paliwal who testified he confronted Egho before he flew back to
15 Miami and left this conspiracy behind him. He testified that he
16 told Egho they had been used for a fraud, and that conversation
17 occurred in November of 2018. What was Egho's response? He
18 didn't care.

19 Seriously. Let's step back for a moment and think
20 about Sooraji Paliwal too. 19-year-old Sooraji Paliwal, fresh
21 off of his encounter with a 30-year-old guy in a 7-Eleven
22 parking lot, who makes this spectacularly bad decision to fly
23 all the way up to the northeast to supposedly make music at an
24 Air B&B with complete strangers. This kid puts together that
25 he's in a fraud in a matter of weeks, and now we're to believe

1 that Eggho, who is with Jay and Charlemagne for up to a year,
2 picking up packages all over the place, had no idea what was
3 going on?

4 Ladies and gentlemen, it doesn't make sense. And
5 that's something else I want you to remember. You get a lot of
6 instructions, and you keep hearing they're boring. I think
7 they're important. I think you learn a lot from the
8 instructions. But there's one thing I want you to really
9 remember; and it's regardless of all the words on the page you
10 never lose your common sense, all right. And what does your
11 common sense tell you here after you review the evidence? That
12 Eggho knew exactly what was in the packages and what was going
13 on.

14 Think of the video that Ms. Goo showed you all of
15 David Green flipping through the money. Flipping through the
16 money as it's packaged in those envelopes. You all remember the
17 magazine it was? It was -- I think I have it as Country Sampler
18 Magazine. Mrs. Ricci testified, what did she package it in?
19 Better Homes & Gardens magazine. We're not talking Forbes
20 magazine or Teen magazine here, all right. Eggho knew what was
21 going on. He was a part of it.

22 And there's a form of circumstantial evidence that can
23 help you figure this out as well. So I want to read another
24 instruction from you -- for you. Direct proof of knowledge and
25 fraudulent intent is almost never available. It would be a rare

1 case where it could be shown that a person wrote or stated that
2 as of a given time in the past, he committed an act with
3 fraudulent intent. Such direct proof is not required. The
4 ultimate facts of knowledge and criminal intent, though
5 subjective, may be established by circumstantial evidence based
6 upon a person's outward manifestations, his word, his conduct,
7 his acts, and all the surrounding circumstances disclosed by the
8 evidence, and the rational or logical inferences that may be
9 drawn from them. So there's a lot of circumstantial evidence
10 you can rely upon to show Egho knew exactly what he's doing.

11 what was there? Concealment. That's what I want you
12 to think about. All the concealment to hide who he was and what
13 he was doing. The defendant played an active role through his
14 concealment, and we'll list some of them off. He and his
15 conspirators collected tons of addresses where packages could be
16 delivered. The addresses are addresses that needed to look
17 vacant, or they needed to be vacant but look occupied. Fraud.
18 Concealment.

19 The defendant and his co-conspirators ripped labels
20 off packages so they couldn't be traced. Fraud, concealment.

21 They lied to UPS drivers or the occupants of homes.
22 Remember the testimony of David Green saying there were
23 important documents there? Arlene Grant's testimony, which the
24 person told her -- Egho told her they were transcripts.

25 Another one, the conspirators had a rule; don't open

1 the package. And the select few who, like Egho, were allowed to
2 open on the packages, were given instructions to record it, or
3 they couldn't put their face on the recording. They're dealing
4 in cash; they're dealing in checks. Fraud, concealment. Those
5 are all things you can rely upon to show knowledge and intent.
6 And if all of that wasn't enough, there is an instruction that
7 when you hear it, I want bright lightbulbs to go off in your
8 head, if possible.

9 In determining whether the defendant acted knowingly,
10 you may consider whether the defendant deliberately closed his
11 eyes to what would otherwise have been obvious to him. If you
12 find beyond a reasonable doubt that the defendant acted with or
13 that the defendant's ignorance was solely and entirely the
14 result of a conscious purpose to avoid learning the truth, then
15 this element may be satisfied.

16 From the mail fraud statutes: However misleading or
17 deceptive a plan may be, it's not fraudulent if it was devised
18 or carried out in good faith.

19 Do you see good faith with all this concealment?

20 The government can also meet its burden of showing the
21 defendant had knowledge of the falsity of the statements if it
22 establishes beyond a reasonable doubt that he acted with
23 deliberate disregard of whether the statements were true or
24 false, or with the conscious purpose to avoid learning the
25 truth.

1 when you hear that instruction, I want you to think of
2 Leevensky Lambert's testimony as to what the rules of the
3 co-conspirators were among the scheme; don't open the package.
4 Don't ask what's in the package.

5 And let's talk about that. One thing I agree with
6 that Mr. Guillaume said, beyond what he thought we agreed on,
7 people are positioned differently. Mr. Guillaume listed on his
8 slides the folks who said they didn't see Egho opening packages,
9 Mr. St. Juste, Mr. Lambert, Mr. Paliwal. I didn't see on his
10 slide the people who did testify that Egho opened packages;
11 Charlemagne, English, Green.

12 what's the difference? The difference is not that
13 some -- that there was some evidence presented after February of
14 2019, the difference is Charlemagne, English, and Green were
15 managers; St. Juste, Lambert, and Paliwal were not. who would
16 be the people who would know the defendant opened the package?
17 The managers. The people on his level; Charlemagne, English,
18 and Greene.

19 There's some blaming of Jay; Jay was violent, Jay was
20 controlling. No one in this courtroom is arguing Jay is a good
21 guy. Jay was apparently physical with Charlemagne. He was
22 certainly physical with Ms. English and Ms. Jones. You didn't
23 hear any evidence that Jay was physically violent to Egho. Even
24 still, Egho chose to join a conspiracy with him, that's what the
25 evidence shows. This was his co-conspirator. There's nothing

1 to show that Egho was forced into this conspiracy. You got that
2 Exhibit 60 Ms. Goo read for you. Quote, "I wanted to fill in
3 the gap for him until we find him because I know that's what he
4 would ask of me." That's what he would ask of me, fill the gap
5 in this conspiracy.

6 And yeah, you do have the testimony of McArnold
7 Charlemagne as to what Egho did to win Jay's respect. You have
8 that. It exists, it's evidence.

9 Yes, the fraud was bigger than Egho, but the
10 government it is not -- this is another -- here's another
11 instruction. Like I said, I think they're useful. Some
12 conspirators play major roles while others play minor parts in
13 the scheme. An equal role is not what the law requires. He
14 doesn't have to be an international business partner.

15 There appears to be no contention that Egho was at
16 those locations. He was at those locations, other people were
17 close by, they were all working in concert. They went from the
18 Motel 6, they went to the package, they went back to the Motel
19 6. There is question as to the credibility of co-conspirators,
20 but there were six co-conspirators who testified. Every single
21 one of them pointed to Egho's involvement in the scheme at some
22 level.

23 So somehow, even if you set aside six co-conspirators,
24 you have flight records showing he traveled up here from
25 Florida. What is he doing up here from Florida? He's picking

1 up packages in an operation. This is not a legitimate business.
2 We got records showing he's staying, we've got text messages
3 discussing the shipments, we got notes showing he made pickups,
4 we've got cell site data showing he's there. We literally have
5 a video of him putting a package in a co-conspirator's trunk.

6 We got evidence, ladies and gentlemen. You have the
7 opportunity to review it, you have the opportunity to do your
8 job, just as we've done our job. Review that evidence and put
9 it to its proof. And when you do, I want you to think about
10 Eileen Grant's testimony. Think back to her doorstep -- or her
11 doorstep where Eggo snatches that package out of her hand, runs
12 away, she goes running after him, gets into his car and leaves
13 running away. He got away that day.

14 But he can't run today. He is cornered by an
15 overwhelming amount of evidence. He can't hide behind others
16 below him in the conspiracy to do his dirty work, and he can't
17 hide his face from the camera anymore. Ladies and gentlemen,
18 Eggo's time has come. I ask that you review the evidence, look
19 at the law, and return the only verdict that you can, a verdict
20 of guilty on every count.

21 THE COURT: Thank you very much, Mr. Delaney.

22 (Requested portion of transcript complete.)
23
24
25

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2
3 I, Kassandra L. McPherson, Registered Professional
4 Reporter, in and for the United States District Court for the
5 District of Maryland, do hereby certify, pursuant to 28 U.S.C. §
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8 matter and that the transcript page format is in conformance
9 with the regulations of the Judicial Conference of the United
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12 Dated this 3rd day of August 2023.

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